

EXHIBIT A



CT Corporation
Service of Process Notification
05/01/2023
CT Log Number 543754052

Service of Process Transmittal Summary

TO: Anthony Penhale
MindGeek
c/o Philippe Polre Cote, 7777 Decarie Boulevard, Suite 600
Montreal, QC H4P 2H2

RE: Process Served in California

FOR: Mindgeek USA Incorporated (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: JORDAN FLEMING BLOCHER vs. MINDGEEK USA INCORPORATED

CASE #: CV2300474

NATURE OF ACTION: Insurance Litigation

PROCESS SERVED ON: C T Corporation System, GLENDALE, CA

DATE/METHOD OF SERVICE: By Process Server on 05/01/2023 at 14:39

JURISDICTION SERVED: California

ACTION ITEMS: SOP Papers with Transmittal, via UPS Worldwide Saver
Image SOP
Email Notification, Anthony Penhale Anthony.Penhale@MindGeek.com
Email Notification, Chantale Pittarelli chantale.pittarelli@mindgeek.com

REGISTERED AGENT CONTACT: C T Corporation System
330 N BRAND BLVD
STE 700
GLENDALE, CA 91203
866-539-8692
CorporationTeam@wolterskluwer.com

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PROCESS SERVER DELIVERY DETAILS

Date: Mon, May 1, 2023
Server Name: DROP SERVICE

Entity Served	MINDGEEK USA INCORPORATED
Case Number	CV2300474
Jurisdiction	CA

Inserts		



Code: 4085

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

JORDAN FLEMING BLOCHER

Plaintiff / Petitioner / Joint Petitioner,

Case. No. CV23-00474

vs.

MINDGEEK USA INCORPORATED

Defendant / Respondent / Joint Petitioner.

SUMMONS

TO THE DEFENDANT: YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD- UNLESS YOU RESPOND IN WRITING WITHIN 21 DAYS. READ THE INFORMATION BELOW VERY CAREFULLY.

A civil complaint or petition has been filed by the plaintiff(s) against you for the relief as set forth in that document (see complaint or petition). When service is by publication, add a brief statement of the object of the action.

The object of this action is: COMPLAINT FOR A CIVIL CASE ALLEGING THAT THE DEFENDENT OWES THE PLAINTIFF A SUM OF MONEY

1. If you intend to defend this lawsuit, you must do the following within 21 days after service of this summons, exclusive of the day of service:
 - a. File with the Clerk of the Court, whose address is shown below, a **formal written answer** to the complaint or petition, along with the appropriate filing fees, in accordance with the rules of the Court, and;
 - b. Serve a copy of your answer upon the attorney or plaintiff(s) whose name and address is shown below.
2. Unless you respond, a default will be entered upon application of the plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the complaint or petition.

Dated this 21 day of MARCH, 20 23.

Issued on behalf of Plaintiff(s):

Name: JORDAN BLOCHER

Address: 1749 Victorian Ave #418

Phone Number: 775-378-3555

Email: jblocher@nevada.unr.edu

ALICIA L. LERUD

CLERK OF THE COURT

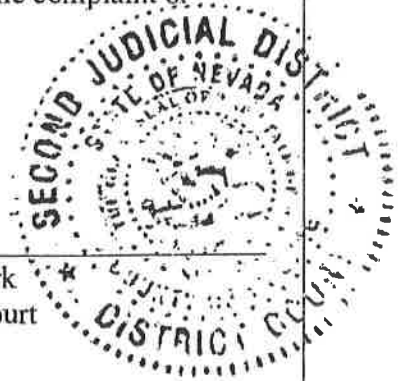
By: /s/MSALAZAR

Deputy Clerk

Second Judicial District Court

75 Court Street

Reno, Nevada 89501



SECOND JUDICIAL DISTRICT COURT
COUNTY OF WASHOE, STATE OF NEVADA

AFFIRMATION
Pursuant to NRS 239B.030 and 603A.040

The undersigned does hereby affirm that the preceding document, (*title of document*)

SUMMONS

file in case number: _____

(☒ *mark one*)

☒ Document does not contain the personal information of any person.

☐ Document contains the personal information of a person as required by: (☒ *mark one*)

☐ A specific state or federal law, to wit: (*write the specific state or federal law*)

☐ For the administration of a public program

☐ For the administration for a federal or state grant

☐ Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230, and
NRS 125B.055)

DATED this (*day*) 21 day of (*month*) March, 2023

Submitted By: (*Your signature*)

(*Print your name*) Jordan Blocher

(*Attorney for*) _____

FILED
Electronically
CV23-00474
2023-04-15 07:48:47 PM
Alicia L. Lerud
Clerk of the Court

Code: 1425

Name: Jordan Blocher
Address: 1749 Victorian Ave #418

Transaction # 9614805 : msalazarperez

Telephone: 775-378-3555
Email: jblocher@nevada.unr.edu

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

JORDAN FLEMING BLOCHER

Plaintiff,

Case No. CV23-00474

vs.

HEARING REQUESTED

MINDGEEK USA INCORPORATED

Defendant

COMPLAINT FOR A CIVIL CASE ALLEGING THAT
THE DEFENDANT OWES THE PLAINTIFF A SUM OF MONEY

I. The Parties to This Complaint

1. The Plaintiff

JORDAN BLOCHER
1749 VICTORIAN AVE #418
SPARKS, WASHOE COUNTY
NEVADA, 89431

2. The Defendant(s)

Defendant No. 1

ANDREW LINK
CHIEF EXECUTIVE OFFICER

21800 OXNARD STREET, SUITE 150
WOODLAND HILLS
CALIFORNIA, 91367

Defendant No. 2

MINDGEEK USA INCORPORATED
21800 OXNARD STREET, SUITE 150
WOODLAND HILLS
CALIFORNIA, 91367

As Andrew Link is the only CEO on the West Coast, and due to his long history with the company MindGeek USA Incorporated. We hold Andrew Link to be held responsible for any debt held by MindGeek, unless the court determines another responsible party.

II. Facts

1. In 2018, the plaintiff remembers seeing a hidden camera. Her boyfriend at the time, Jeff Fenwick, is suspected of uploading videos of the plaintiff to content sites for a profit. The plaintiff discovered this was true after seeing the videos on pornhub, where she clearly remembers the events taking place, the clothes and color of nail polish, and placing her hair over her face.
2. In 2020, the plaintiff was in conflict with her family members due to events that occurred during family vacation.
3. The plaintiff was tortured in her home from late April to mid June 2020, in her apartment at 280 Island Avenue, and was repeatedly drugged without her knowledge or consent. The main method of control used was high energy strobe lights.

4. For almost a month May - June 2020, the plaintiff was held in a state of near or total unconsciousness, tied to a chair in her home, while a group of men tied her limbs and raped her repeatedly, videotaping the acts. She was unaware of the complaints from management, as she does not recall speaking to anyone, and the complaint from the Park Towers HOA was sent to her mother's home in Colorado.

5. A restraining order was filed against the plaintiff, on the parcel of land that is occupied by Park Towers.

6. The plaintiff was clearly not in control of the situation, and was held by force from taking part in the court case that was filed in response to the HOA complaint.

7. The plaintiff was, in effect, evicted via restraining order into the street, just as Covid began. She has been homeless ever since, and does not believe a home to be a safe place.

8. The plaintiff now recalls her experience more clearly, remembering threats of violence. She suspects Jessie, Sean and Brandon, Marc and Mike.

9. The plaintiff has been victimized by an extreme social stigma, and despite being unaware of the reason for the negative attention, fears public places due to the aggression of strangers.

10. The plaintiff's current boyfriend, Ian Frankland, made so many videos that it became impossible to keep them a secret from her, as they were a topic of public discussion.

11. The videos of the 2020 assault were released online only after the statute of limitations for personal injury and defamation had passed in NV, so 2022.

12. The plaintiff states that Ian Frankland teases her for being trafficked, calling her

"my candy j". She considers him to be the person who saved her from the abuse in 2020,

It is unclear if this is true or not.

13. The last time the plaintiff thinks she was assaulted was on February 17, 2023. She

does not know how many times this has happened to her, but fears that the amount of

money made from the videos will incite future assaults.

14. Finally, the negligence of MindGeek is clear. It is also clear that a significant

amount of time and effort has been invested in keeping this case out of court. We intend

to outline these details in Case # CV23-00477.

III. Basis for Jurisdiction

We would like to have submitted this complaint to a CA court, however we have the following reasons to have submitted it here:

Reason 1.

We would prefer that this case be kept separate from the current active, similar case in CA.

8:21-cv-00338-CJC-ADS Jane Doe v. MindGeek USA Incorporated et al.

This is a juvenile case and after having spoken with Susman Godfrey, we agree that the two cases do not support each other.

Reason 2.

There is a local authorized agent who is able to address the size of the claim.

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

Pursuant to 28 U.S.C. § 1332 we acknowledge that the case presented here qualifies for federal prosecution due to the size of the claim.

We ask the court to consider the following amendment to the jurisdiction.

Cause for Local Jurisdiction

We propose to proceed by notifying the registered agent,

C T CORPORATION SYSTEM

701 S CARSON ST STE 200

CARSON CITY, NEVADA, 8970.

We claim that the authorized individual, or agent in this case, to be MATTHEW TAYLOR, and claim him to be entitled or appointed to act or speak for the CA branch:

C T CORPORATION SYSTEM

330 N BRAND BLVD STE 700

GLENDAL, CALIFORNIA, 91203,

with the understanding that the laws as stated above intend to be enforced for the duration of the trial. By so doing we may avoid a case of diversity of citizenship. If the aftermentioned action is proposed to the court and is accepted, the plaintiff will retain the right to appeal to a Federal Court if appropriate to do so during the proceedings.

Amendment to Local Jurisdiction

We would like the following laws to apply to this case:

1. California Penal Code 647(j)(4) makes it a crime post sexually explicit images or videos of someone online, without consent, which causes the victim to suffer serious emotional distress.
 2. The crime of rape is covered under California Penal Code 261 PC and described as non-consensual sexual intercourse by means of force, threats, or fraud.
 3. California Penal Code 286 PC is the primary statute that makes sodomy a crime in specific situations, such as an adult committing sodomy with a minor or using force, fear, or threats on anyone to accomplish the act.
-
4. California Penal Code 236.1 PC defines the crime of human sex trafficking as depriving someone of their personal liberty with intent to obtain forced labor or services.
 5. California Penal Code 289 PC describes the felony crime of forcible penetration with a foreign object as penetrating the vagina or anus of a victim using a foreign object by use of force or fear, without their consent.
 6. California Penal Code 264.1 PC is the statute that makes it a crime to act in concert with another person in committing a rape, known as a "gang rape."

IV. Statement of Claim

1. For Money Paid by Mistake

The defendant owes the plaintiff \$ 224,400 for money paid by mistake to impersonators and account holders.

This number comes from an estimate of the ad revenue from one of the accounts.

2. For Money Had and Received

The defendant was paid money \$ 3,818,400, an estimate of earnings due to
~~the sale of non-consensual porn.~~

This is an estimate of the revenue only from website subscriptions and downloads, and does not include international sales, marketing promotions, or sex toys.

It is unjust for the defendant not to pay the plaintiff the money received because the plaintiff was either unconscious or unaware of the recordings, and so had no choice in the sale of the videos. This falls under the definition of trafficking as described in the Jurisdiction. The plaintiff has little memory of being raped, but has memories of the abuse surrounding it. It should be clear that watching these videos is a nightmarish experience for the plaintiff.

2. Money to Compensate for Personal Loss

The defendant owes the plaintiff \$ 150,000 for tuition.

We claim reparation for the tuition for the doctoral program.

3. Payment for Content

The defendant owes the plaintiff \$ 40,000,000.

\$4m/ year revenue from the videos combined. We are asking for 10 years projected revenue, considered payment for the current content.

The plaintiff has full rights to the revenue from her exploitation.

Explanation.

The two sites combined, over the course of one month, increased by 500 subscriptions. We then applied a standard model to estimate revenue for a year. We did not include any additional profit from downloads, ad revenue, memberships, events and contests, or other sources of revenue. We suspect that mycandyj has won several awards, but did not pursue this avenue of research.

We would consider lowering the amount of this claim if the plaintiff is given ownership of the creator accounts my-candy-j and closeupcandy. We intend to make this demand in Case # CV23-00477.

3. Payment for Lost Wages

Finally, we ask for the same as a yearly compensation for the time that she has spent on her PhD, which is five years, amounting to \$ 20,000,000.

IV. Prayer for the Just

I, Jordan Blocher, self-represented, submit this complaint to the Court.

By Section 8 of the Constitution, this Court has the right to take everything away, or grant everything. I suppose it truly is a prayer.

I pray for relief in the amount of \$ 64,000,000, to be paid by the Defendant, MINDGEEK USA INCORPORATED, because of the reasons stated here, court cases CV20-0083, CV-23-0077, and all the pleadings and papers on file in this case; the attached exhibits hereto, if any; and the argument that the actions of MindGeek USA Incorporated have violated the 13th Amendment, if allowed to argue at the time of hearing.

DATED: (insert date) 4/15/2023, 2023.

(Signature) 

(Print your name) Jordan Blocher

This document does not contain the personal information of any person as defined by NRS 603A.040.

I declare under penalty of perjury under the law of the State of Nevada the foregoing is true and correct.

Date 4/12/2023

Your Signature



Your Name Jordan Blocher